## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA 504 HAMILTON STREET, ROOM 1601 ALLENTOWN, PENNSYLVANIA 18101-1500

LIUDVIKAS BUKYS, PAMELA ANN K. BUKYS, H/W INDIVIDUALLY AND LIUDVIKAS BUKYS, AS ADMINISTRATOR OF THE ESTATE OF KATHERINE A. BUKYS, DECEASED,

: CIVIL ACTION

: No. 15-cv-04110

Plaintiffs,

; HON, JEFFERY L, SCHMEHL

٧.

RICHARD J. TABOR, M.D.; TEAM HEALTH HOLDINGS, INC. doing business as TEAM HEALTH, ERM MEDICINE; THE POCONO HEALTH SYSTEM doing business as THE POCONO MEDICAL CENTER,

Defendants.

## SO ORDERED STIPULATION DISMISSING TEAM HEALTH HOLDINGS, INC. WITHOUT PREJUDICE AND ALLOWING PLAINTIFFS TO AMEND THE COMPLAINT

counsel for defendant Team Health Holdings, Inc. ("THHI"), and by counsel for defendant Richard J. Tabor, M.D. (Dr. Tabor being the only party to have answered to date), that: (1) this action as against THHI only, and all claims and cross-claims asserted therein against THHI, be and hereby are dismissed without prejudice and without costs to any party; (2) in the event a party hereto, or a party added in the future, re-pleads THHI into this action, or THHI is a party to a new action arising from or relating to the facts at issue in this action, this *Stipulation* shall not serve, or be construed, as consent to personal jurisdiction by THHI in this Court or State, creating personal jurisdiction over THHI in this Court or State, or a waiver of any claims, defenses, or rights by THHI or any party, including, but not

limited to, the defense of lack of personal jurisdiction; and (3) plaintiffs be and hereby are given leave to amend the Complaint to name Emergency Care Services of Pennsylvania, P.C. as a Defendant.

MATTIONI, LTD.

BECKER LLC

By: Eugene Mattioni, Esq. Attorney I.D. #15291 399 Market Street, Suite 200 Philadelphia, PA 19106 (215) 629-1600 (215) 923-2227 (fax) E-mail: emattioni@mattioni.com	By:  A. Wesley Bridges, Ir., Esq. Attorney I.D. #92650  Woodland Falls Corporate Center 220 Lake Drive East, Suite 102 (856) 779-8700 (856) 779-8716 (fax)  E-mail: wbridges@becker.legal
Attorneys for Plaintiffs  Dated: 10 26 2015, 201	Attorneys for Team Health Holdings, Inc.  5 Dated: 10/27, 2015
RAYNOR AND ASSOCIATES, P.C.	
By:  Nancy Raynor, Esq. Attorney I.D. #46418 Carolyn Sollecito, Esq. Attorney I.D. #54489 5 Great Valley Parkway, Suite 355 Malvern, PA 19355 (610) 644-9005 (610) 644-9002 (fax) nraynor@raynor-assoc.com Attorneys for Richard J. Tabor, M.D.	· · · · · · · · · · · · · · · · · · ·
Dated;, 2015	
SO ORDERED this day of	, 2015
JEFFREY L. SCHMEHL, U.S.D.J.	

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By: Eugene Mattioni, Esq. Attorney I.D. #15291 399 Market Street, Suite 200 Philadelphia, PA 19106 (215) 629-1600 (215) 923-2227 (fax) E-mail: emattioni@mattioni.com  Attorneys for Plaintiffs	By:  A. Wesley Bridges, Jr., Esq. Attorney I.D. #92650  Woodland Falls Corporate Center 220 Lake Drive East, Suite 102 (856) 779-8700 (856) 779-8716 (fax)  E-mail: wbridges@becker.legal  Attorneys for Team Health Holdings, Inc.
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SO ORDERED this day of	, 2015
TEFFREY I SCHMEHL, U.S.D.J.	